

KIMBERLY P. STEIN, ESQ.
Nevada Bar No. 8675
kps@fdlawlv.com
FLANGAS DALACAS LAW GROUP
3275 South Jones Boulevard, Suite 105
Las Vegas, NV 89146
Telephone: (702) 307-9500
Attorneys for Plaintiff/Counterclaim Defendant Tsai-Lu Shen

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TSAI-LU SHEN, an individual,
Plaintiff,

v.

MICHELLE LACOUR, an individual; DOES I-
X, inclusive; and ROE CORPORATIONS I-X,
inclusive,
Defendants.

MICHELLE LACOUR,
Counterclaimant,

v.

TSAI-LU SHEN,
Counterclaim
Defendant,

MICHELLE LACOUR,
Third-Party Plaintiff,

v.

JAYSON BAYBUTT and PUBCO
REPORTING SOLUTIONS, INC.,
Third-Party Defendants.

Case No: 2:19-CV-01564-JAD-VCF

**STIPULATION AND ORDER
TO STAY MATTER
(ECF NO. 79 AND ECF. NO 109;
and ECF NO. 103 AND 104)**

Pursuant to Local Rule 7-1, Plaintiff/Counterclaim Defendant, Tsai-Lu Shen's,
("Shen"), Defendant/Counterclaimant Michelle LaCour's ("Defendant" or "LaCour"), and
Third-Party Defendants Jason Baybutt and Pubco Reporting Solutions (collectively, "Third

Party Defendants”) by and through their counsel of record, hereby stipulate and agree as follows:

1. That the parties are engaged in settlement negotiations to resolve the above-captioned matter and believe it would promote settlement for the matter to be stayed sixty (60) days to allow for completion of the settlement terms and at that time it is anticipated the parties will submit a Stipulation and Order to Dismiss.
2. Currently, Plaintiff’s deadline to file his response to the remaining Counterclaims is March 16, 2021. Third-Party Defendants’ responsive pleading is due April 15, 2021, and thereafter it was anticipated that a new 26(f) conference would occur and thereafter a new Joint Stipulated Discovery Plan and Scheduling Order would be submitted based on the addition of the new parties.
3. There is currently no trial or hearings scheduled in this matter.

Respectfully submitted by:

Dated: March 15, 2021

/s/ Kimberly P. Stein
 KIMBERLY P. STEIN, ESQ.
 Nevada Bar No. 8675
 FLANGAS DALACAS LAW GROUP
 3275 S. Jones Blvd., Suite 105
 Las Vegas, NV 89146
 Attorneys for Plaintiff/Counterclaim
 Defendant Tsai-Lu Shen

Dated: March 15, 2021

/s/John H. Jamnback
 JOHN K. GALLAGHER ESQ.
 Nevada Bar No. 956
 S. TIMOTHY SUMMERS, ESQ.
 Nevada Bar No. 12285
 PATRICK H. GALLAGHER, ESQ.
 Nevada Bar No. 14875
 GUILD, GALLAGHER, FULLER, LTD.
 100 W. Liberty St., Ste. 800
 Reno, Nevada 89501
 JOHN H. JAMNBACK, ESQ.
 Washington State Bar No. 29872
 (pro hac vice approved)
 YARMUTH LLP
 1420 Fifth Ave., Suite 1400
 Seattle, WA 98101
 Attorneys for Defendant Michelle LaCour

1 Dated: March 15, 2021

2 /s/Michael E. Sullivan

3 MICHAEL E. SULLIVAN, ESQ.

4 Nevada Bar No. 5412

5 ROBISON, SHARP, SULLIVAN & BRUST

6 71 Washington Street

7 Reno, NV 89503

8 WRIGHT NOEL, ESQ.

9 Washington State Bar No. 25264

10 *(pro hac vice approved)*

11 CARSON-NOEL PLLC

12 20 Sixth Avenue, NE

13 Issaquah, WA 98027

14 *Attorneys for Third Party Defendants*

15 *Jason Baybutt and Pubco Reporting Solutions*

16 **ORDER**

17 **IT IS HEREBY ORDERED** that this matter is stayed for sixty (60) days and that
18 all current deadlines are extended until expiration of the stay.

19 Dated this 18th day of March, 2021.



20 **UNITED STATES MAGISTRATE JUDGE**